

radio receivers, the FLEWUG recommends extending the basic receiver selectivity requirement for the 821-824/866-869 MHz public safety band into the 746-806 MHz band. The Federal Government and industry associations, such as the TIA, have long recognized and endorsed the need for receiver performance standards. These standards should be set in a fashion consistent with existing NTIA and TIA performance standards.

65. We support the goal of all public safety mobile and portable radios operating in the 746-806 MHz band being capable of operating on all voice and data interoperability channels in the band. However, we do not support requiring radios that operate in the band to also be capable of operating in all commercial channels in the band. Such a requirement could unnecessarily increase costs of the radios without a significant benefit to interoperability.

C. TECHNICAL PARAMETERS FOR ALL PUBLIC SAFETY CHANNELS AND OPERATIONS IN 746-806 MHZ BAND

1. Bandwidth

66. Because regional needs may vary based on varying topographies, population density, spectrum use, and utilization of data and other services that require more bandwidth, the FLEWUG advocates that these issues be determined for each type of spectrum by the designated planning committees, in conjunction with the appropriate national coordination body.

D. USE OF TELEVISION CHANNELS 63, 64, 68, AND 69 FOR PUBLIC SAFETY


67. The FCC seeks comment on their proposal to use frequencies in channels 63 and 64 for all base-to-mobile transmissions and the frequencies in channels 68 and 69 for all mobile-to-base communications. Also, whether base frequencies in channel 63 should be paired with mobile frequencies in channel 68 and base frequencies in channel 64 should be paired with mobile frequencies in channel 69. The FLEWUG observes that this is the standard, status-quo manner for pairing public safety channels into matched send-and-receive sets. While workable, it is emblematic of channel-wise management of frequency. This scheme is somewhat outdated given more progressive block-wise approaches for frequency management, and the reduced channel spacing requirements and interference concerns associated with today's technology.

E. PROTECTION OF TELEVISION SERVICES

68. Based on the current technologies available, the FLEWUG supports the position of having the new licensees and the TV licensees privately negotiate shorter geographic separations than those proposed. However, basic separation tables should be developed to provide recommended separations.

IV. CONCLUSION

69. For the foregoing reasons, the FLEWUG respectfully requests that the Commission adopt the measures proposed in these Comments.


James J. Flyzik

Deputy Assistant Secretary (Information Systems) and
Chief Information Officer, Department of the Treasury, and
Vice Chair, Government Information Technology Services (GITS) Board

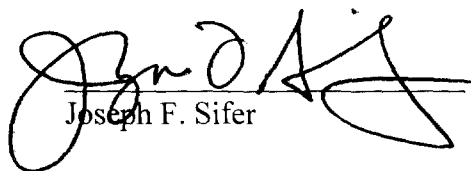
Before the
Federal Communications Commission
Washington, D.C. 20554

Certificate of Service

In the Matter of)	
)	
The Development of Operational, Technical,)	
and Spectrum Requirements for Meeting Federal,)	WT Docket No. 96-86
State, and Local Public Safety Agency Communication)	
Requirements Through the Year 2010.)	
)	
Establishment of Rules and Requirements)	
For Priority Access Service)	

I, Joseph F. Sifer, Senior Associate, 8283 Greensboro Drive, McLean, Virginia, 22102-3838, hereby certify that on December 22, 1997, I caused to be served, by first-class mail, postage prepaid (or by hand where noted) copies of the Federal Law Enforcement Wireless Users Group's Comments *In the Matter of The Development of Operational, Technical and Spectrum Requirements for Meeting Federal, State and Local Public Safety Agency Communication Requirements Through the Year 2010*, WT Docket No. 96-86 (rel. October 24, 1994), the original of which is filed herewith and upon the parties identified on the attached service list.

DATED at Fair Oaks, Virginia this 22nd day of December, 1997.


Joseph F. Sifer

**In the Matter of
The Development of Operational, Technical
and Spectrum Requirements for Meeting Federal,
State and Local Public Safety Agency Communication
Requirements Through the Year 2010,
WT Docket No. 96-86
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